IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

PNC Bank, National Association, successor in interest by merger to National City Bank, successor in interest by merger to Mid America Bank, fsb

Plaintiff,

v.

Case No. 1:12 cv 05209

Allen J. Gibson; Kathleen M. Gibson; Somercor 504, Inc., an Illinois corporation; Small Business Administration, an Agency of the United States of America; Jaws Lazer Wash, Inc., an Illinois corporation,

Assigned Judge: Charles P. Kocoras

Magistrate Judge: Jeffrey T.Gilbert

Defendants.

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Plaintiff, PNC Bank, National Association, successor in interest by merger to National City Bank, successor in interest by merger to Mid America Bank, FSB, by its attorneys Crowley & Lamb, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Defendant(s):

Allen J. Gibson; Kathleen M. Gibson; Somercor 504, Inc., an Illinois corporation; Jaws Lazer Wash, Inc., an Illinois corporation, and as grounds thereof state:

As appears from the Affidavit of Plaintiff placed on file in support of this Motion, and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, successor in interest by merger to National City Bank, successor in interest by merger to Mid America Bank, FSB

By: /s/ Jennifer E. Frick
One of Its Attorneys

Patrick D. Lamb (ARDC #3128062) Jennifer E. Frick (ARDC#6299794) CROWLEY & LAMB, P.C. 221 N. LaSalle Street, Suite 1550 Chicago, Illinois 60601 (312) 670-6900 plamb@crowleylamb.com jfrick@crowleylamb.com